

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**JANELLE BRIDGES, *et al.***

**Plaintiffs,**

**v.**

**KYLE WILSON, *et al.*,**

**Defendants.**

**Case No. 15-cv-126-GKF-PJC**

**PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LIST**

COMES NOW the Plaintiffs by and through their undersigned counsel, and for their Preliminary Witness and Exhibit List pursuant to the Court's Amended Scheduling Order [Dkt.# 28], submits the following:

**A. WITNESSES**

<b>Witness</b>	<b>Description of Testimony</b>
Janelle Bridges, Plaintiff c/o Plaintiffs Attorneys	Mrs. Bridges was Shane Bridges wife. She was present during the incident and his testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, the decedent's pain and suffering while alive and injured and the damages associated with the loss of her husband, to include economic damages, spousal consortium/support, and parental consortium/support
A█ B█, Plaintiff c/o Plaintiffs Attorneys	A█ B█ was Shane Bridges son and was six (6) years old at the time of the incident. He was present during the incident and his testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, to include all of the damages suffered. He will also offer testimony regarding spousal/parental consortium

B■■■■ B■■■■, Plaintiff c/o Plaintiffs Attorneys	B■■■■ B■■■■ was Shane Bridges son and was eight (8) years old at the time of the incident. He was present during the incident and his testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, to include all of the damages suffered. He will also offer testimony regarding spousal/parental consortium
S■■■■ B■■■■, Jr., Plaintiff c/o Plaintiffs Attorneys	S■■■■ B■■■■, Jr., was Shane Bridges son and was three (3) months old at the time of the incident.
A■■■■ C■■■■, Plaintiff c/o Plaintiffs Attorneys	A■■■■ C■■■■ is Janelle Bridges daughter and was six (6) years old at the time of the incident. She was present during the incident and her testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, to include all of the damages suffered. She will also offer testimony regarding spousal/parental consortium
J■■■■ S■■■■, Plaintiff c/o Plaintiffs Attorneys	J■■■■ S■■■■ was Shane Bridges son and was three (3) years old at the time of the incident. He was present during the incident and her testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, to include all of the damages suffered. She will also offer testimony regarding spousal/parental consortium
J■■■■ H■■■■, Plaintiff c/o Plaintiffs Attorneys	J■■■■ H■■■■ is Janelle Bridges niece, and was six (6) years old at the time of the incident. She was present during the incident and her testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, to include all of the damages suffered. She will also offer testimony regarding spousal/parental consortium
Defendant Kyle Wilson c/o Defendants Attorneys	Will offer testimony regarding the facts and circumstances alleged in Plaintiff's Complaint, as well as his training and experience as a law enforcement officer

Defendant Mike Reed c/o Defendants Attorneys	Will offer testimony regarding the facts and circumstances alleged in Plaintiff's Complaint, as well the policies, procedures, and training of the deputies with the Mayes County Sheriff's Department as well as his investigation of the shooting
Jennifer Branstetter	Will offer testimony consistent with allegations contained in Plaintiff's Complaint
Rod Howell Mayes County Sheriff's Dept.	Identified in Defendant's Rule 26 Initial Disclosures
Julia Fisher Mayes County Sheriff's Dept.	Identified in Defendant's Rule 26 Initial Disclosures
Brett Mull Mayes County Sheriff's Dept.	Identified in Defendant's Rule 26 Initial Disclosures
Robert Carlile Mayes County Sheriff's Dept.	Identified in Defendant's Rule 26 Initial Disclosures
Agent Tammy Ferrari OSBI	Identified in Defendant's Rule 26 Initial Disclosures
Agent Dennis Franchini OSBI	Identified in Defendant's Rule 26 Initial Disclosures
Brad Green OSBI	Identified in Defendant's Rule 26 Initial Disclosures

Wesley Reed Adair Police Dept.	Identified in Defendant's Rule 26 Initial Disclosures
Tyler Brown Grand River Dam Authority	Identified in Defendant's Rule 26 Initial Disclosures
Diana Galloway Dept. Human Services	Identified in Defendant's Rule 26 Initial Disclosures
Dr. Andrea Weins, D.O. Oklahoma Medical Examiners Office	Investigation and findings of autopsy of Decedent
Michael Lyman Plaintiff's Expert	Expert Witness - Police Policies and procedures related to the use of deadly force, the investigation of deadly force incidents of police officers, and the training of officers as it relates to the use of deadly force
Dale Cowan Neighbor of Decedent	He was present next door during the incident and heard gunshots. His testimony will include the facts and circumstances surrounding the incident alleged in Plaintiff's Complaint, and his responding to the scene as a EMR and volunteer for the Diamondhead Fire Dept.
Representative from MESTA Ambulance Service Adair, Oklahoma	Treatment of Decedent at scene and related expenses
Representative from Key Funeral Home Pryor, Oklahoma	Decedent's Funeral/Burial expenses
Representative from Adair Fire Dept.	Responding to scene of incident and any observations

Janice Steidley	Former DA of Rogers & Mayes County. Her testimony will include the facts and circumstances of the incident as presented to her in order to make a determination of whether the shooting of the decedent was justified
Larry Edwards	Former First Asst. DA of Rogers & Mayes County. His testimony will include the facts and circumstances of the incident as presented to him in order to assist the DA in making a determination of whether the shooting of the decedent was justified
Economic Expert Dr. William Clark 1830 Coventry Lane Oklahoma City, OK 73120	Expert Witness - will offer testimony related to the past, present, and future economic losses to Plaintiffs due to the death of Decedent.
Unknown law enforcement personnel	Investigations of the scene, photographs of the scene, measurements of the scene, discussions with witnesses regarding the shooting, and any observations made regarding the incident alleged in Plaintiff's Complaint
Medical/Mental Health personnel responsible for Plaintiff's Treatment	Treatment/Diagnosis of Plaintiffs and related expenses
Emotional Damages Expert Dr. Curtis Grundy P.O. Box 6 Ketchum, OK 74349	Expert Witness – Evaluation/Diagnosis of Plaintiffs, to include past, present, and future mental and emotional damages that will include recommendations for future counseling related to death of Decedent
Any witnesses identified by Defendant and not objected to by Plaintiff	
Any other witnesses necessary to sponsor and/or authenticate exhibits	

**B. EXHIBITS**

No.	EXHIBIT
1	Medical Records and Expenses related to treatment of Decedent at scene
2	Report of Investigation by Oklahoma Medical Examiner's Office
3	Diagram of the Scene, to include demonstrative 3D animation of residence
4	Photographs taken in the police investigation and not objected to by Plaintiff
5	Photographs taken in the OSBI investigation and not objected to by Plaintiff
6	Police/OSBI reports of the incident
7	Deposition(s) of Defendant(s) and/or Discovery Responses
8	Plaintiff's medical expenses as it relates to any physical/emotional treatment undertaken as a result of this incident
9	Mayes County Sheriff's Office Policy and Procedures Manual
10	Defendant's Personnel File
11	Defendant's CLEET Training Records
12	Radio/Dispatch Log Records/Recordings
13	Mayes County District Attorney's File
14	Reports prepared by the Plaintiffs & Defendants expert witnesses
15	Any other documents produced during discovery and not objected to by Plaintiff

Respectfully Submitted,

/s/ Thomas Mortensen

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*Attorneys for Plaintiffs*

### **CERTIFICATE OF DELIVERY**

This is to certify that on the March 16, 2016, a true and correct copy of the foregoing instrument was sent via e-mail and mail, with proper postage, to the following:

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